



February 22, 2012  
Via ECFS Filing

Ms. Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: BullsEye Telecom, Inc. 499 Filer ID 822214**  
**BullsEye Telecom of Virginia, LLC 499 Filer ID 826241**  
**CY 2011 Annual CPNI Certification**  
**EB Docket No. 06-36**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2011 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of BullsEye Telecom, Inc. and its affiliate, BullsEye Telecom of Virginia, LLC.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3004 or via email to rnorton@tminc.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Robin Norton

Robin Norton  
Consultant to BullsEye Telecom, Inc. and Affiliate

cc: David Bailey – BullsEye (via email)  
file: BullsEye - FCC - CPNI  
tms: FCx1201

Enclosures  
RN/sp

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB DOCKET 06-36**

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Annual 64.2009(e) CPNI Certification for:

Calendar Year 2011

**Name of Companies covered by this certification:**

**BullsEye Telecom, Inc.**

**Form 499 Filer ID: 822214**

**BullsEye Telecom of Virginia, LLC**

**Form 499 Filer ID: 826241**

Name of Signatory:


Richard Koslowski

Title of Signatory:

Vice President - Finance

I, Richard Koslowski, certify and state that:

1. I am Vice President - Finance of BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC (collectively known as "BullsEye" or "Company") and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*
2. Attached to this certification as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.
3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.
5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

  
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Richard Koslowski, Vice President - Finance  
BullsEye Telecom, Inc.

2.16.2012  
\_\_\_\_\_  
Date

Statement of CPNI Procedures and Compliance

**BullsEye Telecom, Inc.**  
**And**  
**BullsEye Telecom of Virginia, LLC**

Calendar Year 2011

Attachments:

Accompanying Statement explaining CPNI procedures – Exhibit A  
Explanation of actions taken against data brokers – not applicable  
Summary of customer complaints – not applicable

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

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BullsEye Telecom, Inc.  
And  
BullsEye Telecom of Virginia, LLC

Exhibit A

**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2011)**

BullsEye Telecom, Inc. and BullsEye Telecom of Virginia, LLC, its Virginia operating subsidiary, (collectively known as "BullsEye" or "Company") provides local exchange and long distance services to business customers via traditional wireline and voice over IP technologies. Both Companies use the same procedures for all aspects of operations. The Company provides the following as its Statement of CPNI compliance.

The Company uses CPNI, upon occasion, to market services to its Customers. It notifies its Customers of their right to restrict use of, disclosure, and access to their CPNI through opt-out notifications. The Company maintains records establishing that notice was provided and whether or not the Customer's opt-out instruction was obtained. The Company maintains a record of all sales and marketing campaigns that use CPNI. Prior to marketing to existing Customers, the Company filters the list of contacts using a system flag that indicates whether a Customer has opted-out of marketing activity. Marketing campaigns to educate Customers on events related to their existing services or to make them aware of new services are done under the supervision of senior staff who specify the Customer lists to be used and how the Customers on the list are to be approached. All marketing and sales contact campaigns are measured and tracked and the records are maintained within the Company for a minimum of one year.

BullsEye bills its Customers directly and has taken steps to secure CPNI and manage its release in accordance with FCC rules. The Company has put into place processes to safeguard its Customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

Customer contact personnel have been briefed regarding CPNI upon initial new hire training, and as part of continuous training efforts, including training documentation available at all times on the Company's Intranet learning portal. Training includes information regarding the confidentiality of call detail records, and Company policy not to use, access, release, disclose or destroy customer information in any unauthorized manner, as specified in BullsEye Telecom's Employee Proprietary Information Agreement.

BullsEye Telecom, Inc.  
And  
BullsEye Telecom of Virginia, LLC

Exhibit A

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2011)  
(Page 2)

Call detail information is provided over the telephone to customers under specific circumstances. Customers define an account User Name and Password at the time the Customer account is established. In addition, each Customer must select a secret question and answer upon establishment of an account or when a contact is made. Should a Customer forget or lose the password, such information can be provided to the Customer at the email address established when the account was set up. If the Customer cannot provide the correct password or response to any back-up authentication methods the Company requires that a new password be established. If the Customer cannot provide the password or backup authentication question response, and the Customer question does not fall into the exception where the call detail information is provided by the Customer to the Customer Service Representative, then call detail can only be provided by mail to the Customer's address of record, or by calling the Customer at the telephone number of records

The Company has procedures to maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

For on-line account access, BullsEye's authentication and password procedures are in compliance with the applicable rules set forth in 47 C.F.R. Subpart U, including the implementation of authentication procedures that do not require the use of readily available biographical or account information. BullsEye maintains Customer privacy and data security in private access/log-in applications by issuing unique, random IDs in addition to allowing Customers to select their own unique passwords. By combining a random ID along with a Customer-selected password, the Company has eliminated the risk of log-in information being decrypted with known factors or personal information by unauthorized users. This security strategy is used on all BullsEye on-line private access systems.

The Company does not have retail locations and therefore does not disclose CPNI in-store.

The Company notifies Customers via a previously established email address or mails to the Customer address of record, all notifications regarding account changes (without revealing the changed information): password changes, change in a response to a back-up means of authentication, change to an on-line account, or change or creation of an address of record other than at service initiation.

BullsEye Telecom, Inc.  
And  
BullsEye Telecom of Virginia, LLC

Exhibit A

STATEMENT OF CPNI PROCEDURES AND COMPLIANCE (2011)  
(Page 3)

The Company has not taken any actions against data brokers in the last year.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a Customer's CPNI within seven (7) business days, and to notify Customers of the breach. The Company maintains a record of any breaches discovered and notifications made to the United States Secret Service and FBI. The Customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.